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**From:** Garcia, Al [/O=EXCHANGELABS/OU=EXCHANGE ADMINISTRATIVE GROUP (FYDIBOHF23SPDLT)/CN=RECIPIENTS/CN=98801C1057A54735A3BA909BD871BE23-GARCIA, ALFONSO]  
**Sent:** 7/23/2020 9:06:00 PM  
**To:** Phil Hauck [PHAUCK@helenamt.gov]; Llamozas, Emilio [Llamozas.Emilio@epa.gov]; Matthew Culpo [MCULPO@helenamt.gov]  
**CC:** Ryan Leland [RLELAND@helenamt.gov]; Hanson, Robyn [Hanson.Robyn@epa.gov]; Mark Fitzwater [mfitzwater@helenamt.gov]; Thomas Jodoin [TJODOIN@helenamt.gov]  
**Subject:** RE: Pretreatment Guidance on Industrial Waste Survey Procedures  
**Attachments:** Industrial Pretreatment SOP.doc

Matt and Mark,

As we discussed in our July 23, 2020 meeting, attached is the Industrial Pretreatment SOP, the 1<sup>st</sup> two pages address the IU inventory and characterization process. This was provided by the City of Helena and reviewed by the EPA in the 2017 Pretreatment audit.

Al Garcia

Pretreatment Coordinator  
USEPA Region 8; 8WD-CWW  
1595 Wynkoop  
Denver, CO 80202

[garcia.al@epa.gov](mailto:garcia.al@epa.gov)  
303.312.6382

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**From:** Phil Hauck <PHAUCK@helenamt.gov>  
**Sent:** Wednesday, July 22, 2020 9:40 AM  
**To:** Llamozas, Emilio <Llamozas.Emilio@epa.gov>; Matthew Culpo <MCULPO@helenamt.gov>  
**Cc:** Ryan Leland <RLELAND@helenamt.gov>; Hanson, Robyn <Hanson.Robyn@epa.gov>; Garcia, Al <garcia.al@epa.gov>; Mark Fitzwater <mfitzwater@helenamt.gov>; Thomas Jodoin <TJODOIN@helenamt.gov>  
**Subject:** RE: Pretreatment Guidance on Industrial Waste Survey Procedures

Thanks Emilio, I'm sure these will prove helpful to our staff. We'll see if there are any further follow up questions tomorrow.

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**From:** Llamozas, Emilio <Llamozas.Emilio@epa.gov>  
**Sent:** Monday, July 20, 2020 4:43 PM  
**To:** Matthew Culpo <MCULPO@helenamt.gov>; Phil Hauck <PHAUCK@helenamt.gov>  
**Cc:** Ryan Leland <RLELAND@helenamt.gov>; Hanson, Robyn <Hanson.Robyn@epa.gov>; Garcia, Al <garcia.al@epa.gov>; Mark Fitzwater <mfitzwater@helenamt.gov>; Thomas Jodoin <TJODOIN@helenamt.gov>  
**Subject:** Pretreatment Guidance on Industrial Waste Survey Procedures

Hi Phil,

I hope you had a good weekend. In your July 16, 2020, letter you asked for EPA guidance for acceptable industrial waste survey procedures. You also asked if there was an acceptable industrial waste survey form available from the EPA?

Below are two guidance materials for Industrial Waste Survey Procedures.

The first link is the "Introduction to the National Pretreatment Guidance." Page 4-2 has a description of the Industrial Waste Survey Procedures.

The second link is a webinar training on industrial waste survey procedures.

**Introduction to the National Pretreatment Guidance.** See page 4-2 on Industrial Waste Survey.  
[https://www.epa.gov/sites/production/files/2015-10/documents/pretreatment\\_program\\_intro\\_2011.pdf](https://www.epa.gov/sites/production/files/2015-10/documents/pretreatment_program_intro_2011.pdf)

**Industrial Waste Survey Procedure Webinar**  
<https://www.epa.gov/npdes/industrial-user-waste-survey-procedures-webinar>

EPA has not developed an industrial waste survey form. Some states have developed short and long industrial waste survey forms. Attached are the short and long forms developed by the State of Florida.

Please let me know if you have any questions.

Thanks,

Emilio Llamozas  
(303) 312-6407 phone  
To report an environmental violation, please visit EPA's website at  
<http://www.epa.gov/compliance/complaints/index.html>

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**From:** Matthew Culpo <[MCULPO@helenamt.gov](mailto:MCULPO@helenamt.gov)>  
**Sent:** Thursday, July 16, 2020 2:51 PM  
**To:** Llamozas, Emilio <[Llamozas.Emilio@epa.gov](mailto:Llamozas.Emilio@epa.gov)>; Phil Hauck <[PHAUCK@helenamt.gov](mailto:PHAUCK@helenamt.gov)>  
**Cc:** Ryan Leland <[RLELAND@helenamt.gov](mailto:RLELAND@helenamt.gov)>; Hanson, Robyn <[Hanson.Robyn@epa.gov](mailto:Hanson.Robyn@epa.gov)>; Garcia, Al <[garcia.al@epa.gov](mailto:garcia.al@epa.gov)>; Mark Fitzwater <[mfitzwater@helenamt.gov](mailto:mfitzwater@helenamt.gov)>; Thomas Jodoin <[TJODOIN@helenamt.gov](mailto:TJODOIN@helenamt.gov)>  
**Subject:** RE: Clean Water Act Letter of Violation and Opportunity to Confer, City of Helena Pretreatment Program

Emilio,

Attached is a letter response to the information requested in the letter you sent in the email below. You should have received a share link to a OneDrive folder with the additional information requested. Additionally, the following link can be used to access the OneDrive folder: [https://lccounty-my.sharepoint.com/:f:/g/personal/mculpo\\_helenamt\\_gov/EmwqfdDBM-JJqocOYzy-6AcB90zMMDD0OUaMi8WerpXXdiA?email=Llamozas.Emilio%40epa.gov&e=N3kcym](https://lccounty-my.sharepoint.com/:f:/g/personal/mculpo_helenamt_gov/EmwqfdDBM-JJqocOYzy-6AcB90zMMDD0OUaMi8WerpXXdiA?email=Llamozas.Emilio%40epa.gov&e=N3kcym)

Please let me know if you have any issues accessing the information.

Regards,

Matt Culpo, P.E.  
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[mculpo@helenamt.gov](mailto:mculpo@helenamt.gov)

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**From:** Llamozas, Emilio <[Llamozas.Emilio@epa.gov](mailto:Llamozas.Emilio@epa.gov)>

**Sent:** Wednesday, July 8, 2020 9:38 AM

**To:** Phil Hauck <[PHAUCK@helenamt.gov](mailto:PHAUCK@helenamt.gov)>

**Cc:** Ryan Leland <[RLELAND@helenamt.gov](mailto:RLELAND@helenamt.gov)>; Hanson, Robyn <[Hanson.Robyn@epa.gov](mailto:Hanson.Robyn@epa.gov)>; Garcia, Al <[garcia.al@epa.gov](mailto:garcia.al@epa.gov)>; Matthew Culpo <[MCULPO@helenamt.gov](mailto:MCULPO@helenamt.gov)>; Mark Fitzwater <[mfitzwater@helenamt.gov](mailto:mfitzwater@helenamt.gov)>

**Subject:** RE: Clean Water Act Letter of Violation and Opportunity to Confer, City of Helena Pretreatment Program

Hi Phil,

Attached is the EPA's response to the Helena's June 11, 2020 LOV response letter. This email also has the attachments to the EPA's response letter.

In response to concerns regarding COVID-19, the EPA has implemented protocols for electronic signatures and e-delivery for these documents. I've requested a read receipt for this email.

We look forward to meeting with the City to confer about the City's efforts to address EPA's alleged violations and to discuss the potential for settlement of the EPA's claims set forth in the LOV.

We are planning to meet with you via Microsoft Teams on July 23, 2020 from 1:30 to 3:30 pm. The Microsoft Team's video conferencing link and phone number information were sent on July 6, 2020.

Please feel free to call me with any questions.

Thanks,

Emilio Llamozas

(303) 312-6407 phone

To report an environmental violation, please visit EPA's website at  
<http://www.epa.gov/compliance/complaints/index.html>